

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

ALLAN RAMOS SOTO,

Plaintiff

vs.

SYNOVOS PUERTO RICO, LLC.

Defendants

Civil No. 18-1603 (ADC)

**MOTION UNDER LOCAL RULE 6 FOR EXTENSION OF TIME
TO ANSWER COMPLAINT OR OTHERWISE PLEAD**

TO THE HONORABLE COURT:

COMES NOW defendant SYNOVOS PUERTO RICO, LLC (hereinafter "Synovos"), by and through its undersigned counsel, and without submitting to the jurisdiction of this Court, very respectfully states and prays:

1. On August 27th, 2018, plaintiff Allan Ramos Soto (hereinafter, "Plaintiff") filed a Complaint against Synovos before this Court. (Docket No. 1).
2. On November 14th, 2018, Synovos received copy of the summons and Complaint in this action. Assuming Synovos was properly served, the twenty-one (21) day period to answer the Complaint expires on December 5th, 2018.
3. The undersigned attorneys were recently retained by Synovos and are currently investigating Plaintiff's allegations. Synovos needs additional time to adequately answer the Complaint or otherwise respond. Accordingly, it hereby

requests, pursuant to Local Rule 6, an extension of thirty (30) days—that is, until January 4, 2019—to answer the Complaint or otherwise plead.

WHEREFORE, Synovos respectfully requests an extension of thirty (30) days – until January 4, 2019– to respond to the Complaint or otherwise plead.

CERTIFICATE OF SERVICE: I hereby certify that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the CM/ECF participants including Plaintiff's Attorney: José F. Quetglas-Jordán, jfquetglas@gmail.com; quetglaslawpsc@gmail.com.

In San Juan, Puerto Rico, this 4th day of December, 2018.

**SANABRIA BAUERMEISTER GARCIA & BERIO
LLC**

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